

**ATTACHMENT A****Regulatory Advice from Government Departments****EA # 2262 – Valentine Gold Project Expansion – Berry Pit**

During the environmental assessment review provincial and federal government departments and agencies indicated that the following plans, permits, licences, approvals and/or other authorizations are or may be required before your project commences. This is not intended to be a comprehensive list and you are responsible for consulting with federal and provincial government authorities regarding any additional authorizations that may be required by law.

The Climate Change Branch (CCB) of the Department of Environment and Climate Change advises that the previously approved project surpassed the GHG emissions threshold for regulation under the **Management of Greenhouse Gas Act (MGGA)**. The project remains regulated and any additional GHG emissions associated with the expansion project will need to be reported appropriately. The clearing of trees and brush can contribute to climate change. Where required, all clearing activities must be undertaken with appropriate permits through the Forestry Division. In addition, all heavy duty equipment used in this project should be operated in a manner to maximize fuel efficiency, thereby reducing greenhouse gas emissions that could contribute to climate change. For further information, please contact the CCB at (709) 729-1485.

The Pollution Prevention Division (PPD) of the Department of Environment and Climate Change advises you to consider developing a contingency plan specific to the proposed undertaking to enable a quick and effective response to a spill event. All wastes must be collected for disposal at an approved waste management facility. An amendment to the current Certificate of Approval – Valentine Gold Project (Early Works) will be required. A separate Certificate of Approval for project operation will also be required. For further information, please contact the PPD at (709) 729-5782.

The Water Resources Management Division (WRMD) of the Department of Environment and Climate Change advises that permits are required for;

- any work in or within fifteen (15) metres of a body of water (including wetlands);
- a water use licence is required for the use of water from any water source for any purpose; and,
- a permit to Alter a Body of Water will be required if the construction of additional sedimentation ponds meets the definition of a dam.

Any effluent or runoff leaving the site must conform to the Environmental Control Water and Sewer Regulations. Amendment to the Permit to Alter a Body of Water (ALT12945-2023) that was issued on February 22, 2023 will be required, and an amendment to the Permit to Alter a Body of Water (ALT12979-2023) issued on April 5, 2023 may also be required. For further information, please contact the WRMD at (709) 729-1646.

The Occupational Health and Safety Division of the Department of Digital Government and Service NL advises you to ensure that the activities associated with the development are conducted in compliance with the **Occupational Health and Safety Act** and its regulations. This includes the responsibility for ensuring that contractors hired to perform work also comply with this legislation. For further information, please contact OHS at 1 (800) 563-5471.

The Department of Fisheries, Forestry and Agriculture (FFA) advises you to operate under established legislation to avoid or minimize adverse impacts. FFA further advises that a license to occupy must be obtained prior to the commencement of construction. For further information, please contact FFA at (709) 637-2353.

The Department of Immigration, Population Growth and Skills (IPGS) encourages the Proponent to ensure alignment with Charter and Trade Policy respecting labour mobility with respect to employment targets and priority consideration for Newfoundlanders and Labradorians. Upon completion of the Gender Equity, Diversity and Inclusion Plan, it is requested that the plan be shared with IPGS, in addition to the Department of Industry, Energy and Technology, and the Office of Women and Gender Equality for consideration. Should the Proponent need to hire international workers, IPGS delivers two provincial immigration programs that can help employers recruit international workers for long-term employment in the province. For further information, please contact the IPGS at (709) 729-2480.

The Department of Industry, Energy and Technology (IET) advises that the current surface lease is not sufficient to cover the areal extent of the infrastructure proposed in relation to the expansion, including the full extent of the Berry Pit. As per section 33 of the **Mineral Act**, an additional surface lease is required that would cover the areal extent of infrastructure not covered by the current surface lease. Prior to the start of the development of Berry Pit, an acceptable amendment to the Development Plan and the Rehabilitation and Closure Plan which incorporates the Valentine Lake Project in its entirety must be submitted. And a satisfactory Acid Rock Drainage/ Metal Leaching (ARD/ML) Report and ARD/ML Management Plan for the Valentine Lake Project in its entirety. For further information, please contact IET at (709) 729-3131.

Environment and Climate Change Canada (ECCC) recommends that you develop the following plans:

- A water quality monitoring program; and,
- A contingency plan to enable quick and effective responses to spill events.

ECCC request the opportunity to review the updated follow up and monitoring plans for avoiding and mitigating the Projects effects on Caribou and the American Marten (Newfoundland population). ECCC advises that in order to avoid nest destruction and to accommodate the breeding season of migratory birds, operations should consider nesting locations between mid-April and mid-August in this region. ECCC requests that species-at-risk sightings be reported to the Canadian Wildlife Service (CWS) at

[ec.scfatldonneesei-cwsatliadata.ec@ec.gc.ca](mailto:ec.scfatldonneesei-cwsatliadata.ec@ec.gc.ca) and to the Atlantic Canada Conservation Data Centre at <http://accdc.com/en/contribute.html>. For further information, please contact the ECCC-CWS at (709) 777-4221.

Fisheries and Oceans Canada (DFO) advises that Marathon Gold Corp. currently holds an active Fisheries Act Authorization (FAA) for the occurring the Valentine Gold Project. Amendments may need to be made to the FAA due to the potential effects to additional fish and fish habitat in the area as caused by the project expansion. For further information, please contact the Fish and Fish Habitat Protection Program at (709) 772-4140.

Transport Canada (TC) advises that approval may be required. The Proponent is encouraged to contact the Navigation Protection Program and confirm if this new pit and its associated works will require infilling or dewatering of fish-bearing and/or navigable waterbodies. For more information, please contact the NNP at (506) 851-3113.